

# EXHIBIT D

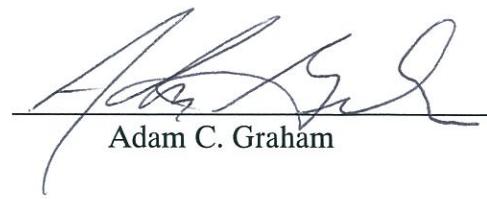
**AFFIDAVIT OF**  
**ADAM C. GRAHAM**

STATE OF MICHIGAN      )  
                            )  
COUNTY OF WAYNE      )  
                            )

I, Adam C. Graham, being first duly sworn and affirmed upon my oath, hereby state as follows. The below are comments given in truth, to the best of my ability, and if called to testify I would be competent to testify as to such.

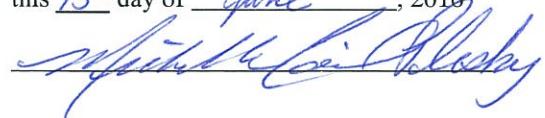
1. I am employed by Miller Cohen, P.L.C. as an attorney.
2. I represent Natalie Reeser in her lawsuit action against Henry Ford Health System d/b/a Henry Ford Hospital.
3. Based on knowledge and experience, \$250.00 an hour is a reasonable and customary rate for employment attorneys in downtown Detroit, Michigan. This is the rate that potential clients are willing to pay in such matters in an arm's length transaction.
4. The time spent on this case as noted on the statement of attorney fees (*Exhibit A*) are taken from the firm's system for tracking attorney time.
5. The entries on the statement of attorney fees are from records of time keeping. The information on the statement is generated from the information submitted on this software.
6. The entries on the statement of attorney fees are true and correct. All time recorded on the statements reflects time actually spent on this case. I have not represented Ms. Reeser in any other matter. All of the factual assertions on Motion for Attorney Fees are true and correct based on my knowledge and belief.
7. I have experience in representing workers in various actions, including on an individual basis, as Ms. Reeser, and on behalf of their respective unions. Miller Cohen P.L.C. has represented numerous clients on issues related to Whistleblower actions and the attorneys involved in this case practice nearly exclusively in labor and employment law.
8. I have also reviewed all of the expenses listed in the Bill of Costs. All of these expenses are accurate based on the records of payment. All of the witness fees include mileage as reported by each witness. Each expense was for services actually and necessarily performed in prosecuting Ms. Reeser's case.

Further affiant sayeth not.



Adam C. Graham

Subscribed and sworn to before me on  
this 15<sup>th</sup> day of June, 2016



MICHELLE COIL PLESKY  
NOTARY PUBLIC, STATE OF MI  
COUNTY OF ST. CLAIR  
MY COMMISSION EXPIRES Oct 21, 2022  
Acting IN COUNTY OF Wayne

**AFFIDAVIT OF**  
**KEITH D. FLYNN**

STATE OF MICHIGAN      )  
                            )  
COUNTY OF WAYNE      )  
                            )

I, Keith D. Flynn, being first duly sworn and affirmed upon my oath, hereby state as follows. The below are comments given in truth, to the best of my ability, and if called to testify I would be competent to testify as to such.

1. I am employed by Miller Cohen, P.L.C. as an attorney.
2. I represent Natalie Reeser in her lawsuit action against Henry Ford Health System d/b/a Henry Ford Hospital.
3. Based on knowledge and experience, \$275.00 an hour is a reasonable and customary rate for employment attorneys in downtown Detroit, Michigan. This is the rate that potential clients are willing to pay in such matters in an arm's length transaction.
4. The time spent on this case as noted on the statement of attorney fees (*Exhibit A*) are taken from the firm's system for tracking attorney time.
5. The entries on the statement of attorney fees are from records of time keeping. The information on the statement is generated from the information submitted on this software.
6. The entries on the statement of attorney fees are true and correct. All time recorded on the statements reflects time actually spent on this case. I have not represented Ms. Reeser in any other matter. All of the factual assertions on Motion for Attorney Fees are true and correct based on my knowledge and belief.
7. I have experience in representing workers in various actions, including on an individual basis, as Ms. Reeser, and on behalf of their respective unions. Miller Cohen P.L.C. has represented numerous clients on issues related to Whistleblower actions and the attorneys involved in this case practice nearly exclusively in labor and employment law.
8. I have also reviewed all of the expenses listed in the Bill of Costs. All of these expenses are accurate based on the records of payment. All of the witness fees include mileage as reported by each witness. Each expense was for services actually and necessarily performed in prosecuting Ms. Reeser's case.

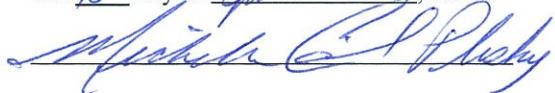
Further affiant sayeth not.



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Keith D. Flynn

Subscribed and sworn to before me on  
this 15<sup>th</sup> day of June, 2016



MICHELLE COIL PLESKY  
NOTARY PUBLIC, STATE OF MI  
COUNTY OF ST. CLAIR  
MY COMMISSION EXPIRES Oct 21, 2022  
ACTING IN COUNTY OF  
*Wayne*

**AFFIDAVIT OF**  
**RICHARD G. MACK, Jr.**

STATE OF MICHIGAN      )  
                                  ) SS  
COUNTY OF WAYNE      )

I, Richard G. Mack, Jr., being first duly sworn and affirmed upon my oath, hereby state as follows. The below are comments given in truth, to the best of my ability, and if called to testify I would be competent to testify as to such.

1. I am employed by Miller Cohen, P.L.C. as an attorney.
2. I represent Natalie Reeser in her lawsuit action against Henry Ford Health System d/b/a Henry Ford Hospital.
3. Based on knowledge and experience, \$300.00 an hour is a reasonable and customary rate for employment attorneys in downtown Detroit, Michigan. This is the rate that potential clients are willing to pay in such matters in an arm's length transaction.
4. The time spent on this case as noted on the statement of attorney fees (*Exhibit A*) are taken from the firm's system for tracking attorney time.
5. The entries on the statement of attorney fees are from records of time keeping. The information on the statement is generated from the information submitted on this software.
6. The entries on the statement of attorney fees are true and correct. All time recorded on the statements reflects time actually spent on this case. I have not represented Ms. Reeser in any other matter. All of the factual assertions on Motion for Attorney Fees are true and correct based on my knowledge and belief.
7. I have experience in representing workers in various actions, including on an individual basis, as Ms. Reeser, and on behalf of their respective unions. Miller Cohen P.L.C. has represented numerous clients on issues related to Whistleblower actions and the attorneys involved in this case practice nearly exclusively in labor and employment law.

Further affiant sayeth not.



Richard G. Mack, Jr.

Subscribed and sworn to before me on  
this 15<sup>th</sup> day of June, 2016

MICHELLE COIL PLESKY  
NOTARY PUBLIC, STATE OF MI  
COUNTY OF ST. CLAIR  
MY COMMISSION EXPIRES Oct 21, 2022  
ACTING IN COUNTY OF  
*Wayne*

**AFFIDAVIT OF**  
**ADA A. VERLOREN**

STATE OF MICHIGAN      )  
                                    ) SS  
COUNTY OF WAYNE      )

I, Ada A. Verloren, being first duly sworn and affirmed upon my oath, hereby state as follows. The below are comments given in truth, to the best of my ability, and if called to testify I would be competent to testify as to such.

1. I was employed by Miller Cohen, P.L.C. as an attorney.
2. I represented Natalie Reeser in her lawsuit action against Henry Ford Health System d/b/a Henry Ford Hospital.
3. Based on knowledge and experience, \$275.00 an hour is a reasonable and customary rate for employment attorneys in downtown Detroit, Michigan. This is the rate that potential clients are willing to pay in such matters in an arm's length transaction.
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7. I have experience in representing workers in various actions, including on an individual basis, as Ms. Reeser, and on behalf of their respective unions.

Further affiant sayeth not.

Ada Verloren

Ada A. Verloren

Subscribed and sworn to before me on  
this 22 day of June, 2016

Ada Verloren

